



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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November 16, 2015

VIA ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

Re: **Gomez v. State of New York, et al., 15-cv-8108 (PAE)**

Dear Judge Engelmayer:

I write to request an extension of the time for Defendants the State of New York and the New York State Assembly ("Assembly") (together "the State Defendants") to answer, move, or otherwise respond to the complaint in this action to December 22, 2015. The State of New York was served on October 30, 2015 and the Assembly was served on November 6, 2015. Thus, pursuant to Fed. R. Civ. P. 12(a)(1)(A), their responses to the complaint are currently due on November 20 and November 27, 2015, respectively.¹ This is the first request for such an extension, and Plaintiff's counsel consents to the request.

The State Defendants respectfully request this extension to allow this Office sufficient time to investigate Plaintiff's allegations, research the relevant law, and draft an appropriate response to the complaint. Further, the requested extension will put the State Defendants on the same schedule with respect to their responses to the complaint.

¹ From a discussion with Plaintiff's counsel, it is our understanding that the remaining defendant, Gabriela Rosa, was served on November 3, 2015. At this time, we do not know whether Ms. Rosa has retained counsel. Ms. Rosa has not requested representation by this Office in this matter, nor has any attorney contacted this Office on her behalf.

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Accordingly, it is respectfully requested that the time for the State Defendants to answer, move, or otherwise respond to the complaint be extended to December 22, 2015. Thank you for your time and consideration of this request.

Respectfully submitted,

/s/ *Alissa S. Wright*

Alissa S. Wright
Assistant Attorney General

cc (by ECF): Delmas A. Costin, Jr., Esq.